STATEMENT OF BASIS (AI No. 8940)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0110744 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Texas Eastern Transmission, LP
LaRose Station
550 East 3rd Street
LaRose, Louisiana 70373

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Shontel Stewart

DATE PREPARED: July 12, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: Not applicable
NPDES permit expiration date: Not applicable
EPA has not retained enforcement authority.

C. LWDPS permit – LWDPS permit effective date: August 20, 1992
LWDPS permit expiration date: August 19, 1997

D. Date Application Received: February 24, 1997, with additional information received in September 10, 1996 permit modification request, January 29, 1999 modification of permit renewal application, December 14, 2004 addendum to permit application, and additional updated information received June 9, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - natural gas compressor station

This facility is an existing natural gas compressor station. Wastewaters consist of treated wastewater from compressor building sump drains, equipment cleaning and housekeeping washwater, air compressor condensate, groundwater infiltrate, and stormwater runoff.

The compressor station was built over a PCB contaminated site. Remediation was completed in 1993, but the remediation plan allowed some PCB contaminated soil to remain on-site based on a hydrology report that indicated no movement of PCBs offsite, as the groundwater movement is radial towards the site which is lower in elevation than the surrounding area.

The site is completely surrounded by a dike to prevent the surrounding water from marshland from flooding the site. Stormwater runoff is captured in ditches inside the dike surrounding the site and flows eastward to a low area and is pumped through a 20" pipe into the diked station drainage pond located on the east side of the site.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4922

C. LOCATION - Highway 657 approximately 2.5 miles northeast of LaRose, LaFourche Parish Latitude 29°35'16", Longitude 90°22'07"

3. OUTFALL INFORMATION

Outfall 001
Discharge Type: Treated wastewater from Internal Outfall 101 and stormwater runoff
Treatment: stormwater settling pond
Location: discharge pipe from the station drainage pond located on the southern boundary of the pond
Flow: Intermittent
Discharge Route: Intracoastal Waterway via marsh

Outfall 101
Discharge Type: Treated wastewater from compressor sump building drains, equipment cleaning and housekeeping washwater, air compressor condensate, and groundwater infiltrate
Treatment: Flow equalization, oil/water separator, particulate pre-filters, clay/coal and activated carbon filters, particulate post-filters, and pH adjustment
Location: wastewater treatment tank located on the southwest side of the facility
Flow: Intermittent
Discharge Route: by ditch thence into Outfall 001

Sanitary Wastewater - Sanitary wastewater is hauled off-site for disposal.

Hydrostatic Test Wastewater – Hydrostatic test water will not be added to Permit per the December 14, 2004 addendum to permit submitted by Texas Eastern Transmission stating that in the event hydrostatic testing is required at the facility, the company will apply for a permit under the LAG670000 Hydrostatic test water permit.

4. RECEIVING WATERS

STREAM - Intracoastal Waterway

BASIN AND SEGMENT - Barataria Basin, Segment 020801

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

LDEQ records were reviewed for the period from January, 2000 through October, 2004. No records of enforcement actions were found.

B. DMR Review/Excursions

Based on a review of DMR data for the period from March, 2003 through December, 2005, the facility has had the following excursions:

Date	Parameter	Outfall	Reported Value	Permit Limits
03/2003	TDS	001	1,198 mg/L (max)	500 mg/L (max)
04/2003	TDS	001	560 mg/L (max)	500 mg/L (max)
06/2003	TDS	001	1,443 mg/L (max)	500 mg/L (max)
06/2003	TDS	001	856 mg/L (max)	500 mg/L (max)
06/2003	TDS	001	706 mg/L (max)	500 mg/L (max)
07/2003	TDS	001	937 mg/L (max)	500 mg/L (max)
07/2003	TDS	001	530 mg/L (max)	500 mg/L (max)
07/2003	TDS	001	791 mg/L (max)	500 mg/L (max)
08/2003	TDS	001	1,071 mg/L (max)	500 mg/L (max)
08/2003	TDS	001	939 mg/L (max)	500 mg/L (max)
09/2003	TDS	001	1,185 mg/L (max)	500 mg/L (max)
09/2003	TDS	001	1,341 mg/L (max)	500 mg/L (max)
10/2003	TDS	001	1,173 mg/L (max)	500 mg/L (max)
11/2003	TDS	001	1,338 mg/L (max)	500 mg/L (max)
12/2003	TDS	001	1,214 mg/L (max)	500 mg/L (max)
12/2003	TDS	001	518 mg/L (max)	500 mg/L (max)
01/2004	TDS	001	664 mg/L (max)	500 mg/L (max)
02/2004	TSS	001	70 mg/L (max)	45 mg/L (max)
03/2004	TDS	001	1,305 mg/L (max)	500 mg/L (max)
04/2004	TDS	001	1,100 mg/L (max)	500 mg/L (max)
04/2004	TSS	001	84 mg/L (max)	45 mg/L (max)
05/2004	COD	001	990 mg/L (max)	100 mg/L (max)
08/2004	COD	001	110 mg/L (max)	100 mg/L (max)
09/2004	COD	001	110 mg/L (max)	100 mg/L (max)
10/2004	TSS	001	57 mg/L (max)	45 mg/L (max)
10/2004	TDS	001	530 mg/L (max)	500 mg/L (max)
11/2004	TDS	001	630 mg/L (max)	500 mg/L (max)

Date	Parameter	Outfall	Reported Value	Permit Limits
12/2004	TDS	001	880 mg/L (max)	500 mg/L (max)
01/2005	TDS	001	980 mg/L (max)	500 mg/L (max)
04/2005	TSS	001	56 mg/L (max)	45 mg/L (max)
04/2005	TDS	001	1,100mg/L (max)	500 mg/L (max)
05/2005	pH	001	4.19 s.u. (min)	6.0 s.u. (min)
05/2005	TDS	001	1,200mg/L (max)	500 mg/L (max)
05/2005	TSS	001	49 mg/L (max)	45 mg/L (max)
06/2005	TDS	001	1,300mg/L (max)	500 mg/L (max)
11/2005	TDS	001	1,500mg/L (max)	500 mg/L (max)
12/2005	TDS	001	1,000mg/L (max)	500 mg/L (max)

7. CHANGES FROM EXISTING LWDPS PERMIT

The following changes have been made from the 1992 LWDPS permit:

A. Outfall 101: Oil and Grease has been removed because it will be monitored at Outfall 001. The PCB limit has been removed due to completion of remediation efforts and a review of data revealed no PCB contamination. TOC has been moved to Outfall 001 to obtain a more representative sample of oxygen demand on the waterbody and to be consistent with similar permits where TOC is monitored for stormwater. The company's request to remove zinc is not granted due to the detection of zinc, shown in recent analytical data at levels above the limit established in the 1992 LWDPS permit..

B. Outfall 001: The facility's request to remove the TDS and TSS limits, monitoring and reporting requirements is partially granted. Because the facility has the reasonable potential to discharge, the TDS limit has been changed to "Report" and the facility's sampling location has been moved to the southern boundary of the station drainage pond just before it mixes with the marsh to obtain a representative sample. A TDS limit may be imposed at this sample location in any future permit renewal. The TSS limit has been removed due to the time and ability of solids to settle in the before being discharge from the drainage pond. The COD limit has been replaced with TOC due to Best Professional Judgment for the type of wastewater discharges from this outfall. The PCB limit has been removed due to completion of remediation efforts and after a review of the data revealed no PCB contamination.

C. A Stormwater Pollution Prevention Plan (SWP3) requirement is added to the draft permit, in accordance with current DEQ stormwater policy.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020801 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from FWS to LDEQ. Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an

adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

the local newspaper of general circulation and

Office of Environmental Services Public Notice Mailing List

Rationale for Texas Eastern Transmission, LP

1. **Outfall 001**: Treated wastewater from Internal Outfall 101 and stormwater runoff

Pollutant	Limitation Mo. Avg:Daily Max (mg/L)	Reference
Flow (GPD)	Report:Report	LAC 33:IX.2707.I.1.b
TOC	---:50	BPJ; *; LDEQ Stormwater Guidance
Oil & Grease	---:15	BPJ; *; LDEQ Stormwater Guidance
TDS	---:Report	BPJ; similar permits
pH	6 su - 9 su	BPJ; *; LDEQ Stormwater Guidance

* General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004)
BPJ Best Professional Judgement
su Standard Units

Treatment: Stormwater settling pond.

Monitoring Frequency: Flow shall be monitored once per quarter by estimate. TOC, Oil and Grease, TDS, Zinc, and pH shall be monitored once per quarter by grab sample. Monitoring frequencies are established based on the 1992 LWDPS permit by BPJ.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b.
TOC, Oil and Grease, and pH limits are established as BPJ in accordance with the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004) and this Office's guidance on stormwater. TDS is established using BPJ and similarly permitted facilities.

1. **Outfall 101**: The intermittent discharge of equipment cleaning and housekeeping washwater, air compressor condensate, contaminated stormwater, and groundwater infiltrate

Pollutant	Limitation Mo. Avg:Daily Max	Reference
Flow (GPD)	Report:Report	LAC 33:IX.2707.I.1.b
COD	---:125mg/L	BPJ; *; Previous LWDPS permit
Zinc	---:153µg/L	BPJ; Previous LWDPS permit

*	General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004)
BPJ	Best Professional Judgement
su	Standard Units

Treatment: Flow equalization, oil/water separator, particulate pre-filters, clay/coal and activated carbon filters, particulate post-filters, and pH adjustment.

Monitoring Frequency: Flow shall be monitored once per month by estimate. COD and Zinc shall be monitored once per month by grab sample. Monitoring frequencies are established based on the 1992 LWDPS permit by BPJ.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b.
The COD limit is established by BPJ based on the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004) and the previous LWDPS permit. The zinc limit is established based on recent analytical data and the previous LWDPS permit.

3. **TMDL Waterbody** (Intracoastal Waterway - LaRose to Bayou Villars and Bayou Barataria (Estuarine), Segment No. 020801, Barataria Basin)

Segment No. 020801 is not listed on the 2004 Integrated 303(d) list as impaired. A verbal commitment from EPA Region 6 was made agreeing that the use of the LDEQ 2004 Integrated Report is acceptable for permit development, with the exception of the Integrated Report's CALM Category 1 listings for Organic Enrichment/Low DO and any associated impairments (nutrients, ammonia, nitrogen and phosphorus) unless these impairments have been officially delisted previously. Therefore, no impairments remain for Segment No. 020801. Consequently, no additional limits or requirements are added to the draft permit.

4. **Storm Water Pollution Prevention Plan (SWP3) Requirement**

A SWP3 is included in the permit since there is a potential for storm water contamination from processes including loading, unloading, materials storage, equipment and area washdown.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II, Paragraph K of the Draft Permit).